

TROY LAW, PLLC
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Attorney for the Plaintiff

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

Case No. 21-cv-07163

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LETICIA FRANCINE STIDHUM
Plaintiffs,

**PLAINTIFF'S
SUPPLEMENTAL RESPONSES
TO DEFENDANTS'
INTERROGATORIES**

v.

161-10 HILLSIDE AUTO AVE, LLC
d/b/a Hillside Auto Outlet, and
HILLSIDE AUTO MALL INC
d/b/a Hillside Auto Mall,
ISHAQUE THANWALLA,
JORY BARON,
RONALD M BARON, and
ANDRIS GUZMAN,

Defendants.

-----X
Plaintiff LETICIA FRANCINE STIDHUM, by the undersigned counsel, John Troy of TROY LAW, PLLC, pursuant to Rule 33 and 34 of the Federal Rules of Civil Procedure, hereby provides the following supplemental responses and objections to Defendants' first set of interrogatories as follows:

GENERAL OBJECTIONS

The permissible number of Interrogatories is controlled by Rule 33(a) which reads in part, "[u]nless otherwise stipulated or ordered by the court, a party may serve on any other party no more than 25 written interrogatories, including all discrete subparts [.]"

Parties cannot evade this presumptive limitation through the device of joining as "subparts" questions that seek information about discrete separate subjects.

RESPONSES TO INTERROGATORIES

INTERROGATORY NO 7. State whether Plaintiff ever complained to Auto Outlet about discriminatory conduct and for each complaint, (a) state the content of said complaint(s); (b) state the date of said complaint(s); (c) state the location at which said complaints were made; (d) identify persons present when you complained; (e) state whether said complaints were oral or in writing; and (f) describe what, if anything, was said to you in response by the person(s) to whom you complained.

RESPONSE NO 7 Plaintiff states: Yes. In 2018 over text message to Defendant ISHAQUE THANWALLA about GUZMAN's discriminatory conduct, with no response. On or about January 10, 2019, by phone and then in person to ISHAQUE THANWALLA about GUZMAN's discriminatory conduct. ISHAQUE THANWALLA indicated that I would talk with him further on the phone and in person indicated that he would provide a raise. ISHAQUE THANWALLA failed to provide the promised bonus.

On January 24, 2019, I texted Jory Baron to inform him I had not been paid. Later on January 24, 2019, Jory Baron called me back. I calmly explained how I had been sabotaged, why I had quit, and THANWALLA still owed me money. Jory Baron replied that I should "stop ranting," tell him how much I felt I was owed, and that he would confirm with THANWALLA and call me back the following Monday. Jory Baron did not call me back the following Monday, January 28, 2019, or any time thereafter.

SUPPLEMENTAL RESPONSE NO 7 In addition to the above conversations, Plaintiff states that in or about December 2018, Plaintiff spoke in person to RONALD BARON in-person at Hillside Auto Outlet. At the time, Plaintiff disclosed her pregnancy and said that she was just a couple of cars away from hitting the 30-car bonus threshold to receive an additional \$1,000. RONALD BARON spoke with ISAAC THANWALLA to "give the girl the bonus."

INTERROGATORY NO 19. State whether Plaintiff has been involved in any civil or insolvency proceedings in federal, state, local or at an administrative level. If your answer is in the affirmative, please state the caption of the proceeding (including case number and year), the nature of the proceeding, your involvement, and the disposition of the proceeding.

RESPONSE NO 19 Plaintiff objects to this interrogatories as irrelevant to the pregnancy discrimination claim. To the extent the information is sought for impeachment purposes, only felonies and other convictions for crimes involving a dishonest act or false statement would be relevant (regardless of the date). See Fed. R. Evid. 609(a).

SUPPLEMENTAL RESPONSE NO 19 Plaintiff interposes the same objections to the above referenced request.

Plaintiff reserves the right to amend, modify or supplement this response.

Dated: Flushing, New York
February 10, 2023

TROY LAW, PLLC
*Attorneys for the Plaintiff, proposed FLSA
Collective and potential Rule 23 Class*
/s/ John Troy
John Troy

Certificate of Service

I, John Troy, an attorney duly admitted in the State of New York and in this court, hereby certify:

I have today served the annexed Plaintiff's Responses to Defendants' First Set of Interrogatories to Plaintiff by causing a copy to be sent via first class mail and electronic mail to their attorney of record at the email address below:

Emanuel Kataev, Esq.
3000 Marcus Avenue, Suite 3W8
Lake Success, NY 11042
Tel: 5163288899

Attorneys for Defendants

Dated: Flushing, New York
February 10, 2023

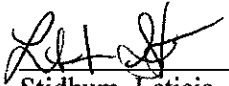
TROY LAW, PLLC
/s/ John Troy
John Troy
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Flushing, NY 11355
Tel: (718) 762-1324
troylaw@troypllc.com
Attorney for Plaintiffs

VERIFICATION

STATE OF NEW YORK)
)
) ss:
)
COUNTY OF QUEENS)

I, Stidhum, Leticia, being duly sworn, states that I am a Plaintiff in this action, that I have read the foregoing Plaintiff's Supplemental Response to Defendants' Interrogatories, and know the contents thereof, and the same are true to my knowledge, information and belief.

Date: 16th day of April, 2023



Stidhum, Leticia

Sworn to before me on

This 16th day of April, 2023



NOTARY PUBLIC

JOHN TROY
Notary Public, State of New York
No. 02TR6121824
Qualified in Queens County
Commission Expires April 12, 2025

AARON B. SCHWEITZER
Notary Public, State of New York
No. 02SC6380865
Qualified in Nassau County
Commission Expires September 17, 2026

TIFFANY TROY
Notary Public, State of New York
No. 02TR6419683
Qualified in Queens County
Commission Expires July 12, 2025